

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re: Bankr. Case No. 19-32928 (MER)
Rancher's Legacy Meat Co., Chapter 11
Debtor.

NOTICE OF MOTION AND MOTION
FOR RELIEF FROM AUTOMATIC STAY

To: The debtor and other entities specified in Local Rule 9013-3.

1. Great Plains Beef, LLC ("Great Plains") moves the court for the relief requested below and gives notice of hearing.

2. The court will hold a hearing on this motion at 2:30 p.m. on Thursday, February 13, 2020 in Courtroom No. 7 West, at the United States Courthouse, at 300 S. 4th St., Minneapolis, Minnesota, before Chief Bankruptcy Judge Michael E. Ridgway.

3. Any response to this motion must be filed and served not later than **Friday, February 7, 2020**, which is five days before the time set for the hearing (including Saturdays, Sundays, and holidays). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.**

4. This court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334, Fed. R. Bankr. P. 5005, and Local Rule 1070-1. This proceeding is

a core proceeding. The petition commencing this chapter 11 case was filed on September 20, 2019. The case is now pending in this court.

5. This motion arises under 11 U.S.C. §§ 362(d) and 553, Fe. R. Bankr. P. 4001, and Local Rule 4001-1. This motion is filed under Fed. R. Bankr. P. 9014. Great Plains requests relief with respect to its right of setoff.

FACTUAL BACKGROUND

6. Pre-petition, Great Plains sold goods to Debtor. As of the Petition Date, Debtor owed Great Plains \$605,353.51 based on approximately 33 unpaid invoices that existed as of that date (collectively, the “Great Plains Indebtedness”). A true and correct copy of the Proof of Claim of Great Plains, filed as Proof of Claim No. 16, is attached hereto as **Exhibit A**.

7. Based on the unpaid invoices, Great Plains has a 20-day administrative claim under 11 U.S.C. § 503(b)(9) in the amount of \$189,544.48.

8. In addition, pre-petition, Debtor issued invoices to Great Plains that remained unpaid as of the Petition Date (collectively, the “Debtor Invoices”). In total, \$9,192.38 in unpaid Debtor Invoices were due prior to the commencement of this case.

RELIEF REQUESTED AND BASIS FOR RELIEF

9. Great Plains is requesting that the Court grant it relief from the automatic stay under 11 U.S.C. § 362(d) to apply the amount of the Debtor Invoices to the Great Plains Indebtedness, thus exercising its right of setoff as authorized by 11 U.S.C. § 553. *See* 11 U.S.C. § 362(a)(7) (stating that a creditor must obtain relief

from the automatic stay in order to setoff any debt owing to the debtor that arose before commencement of the case).

10. This motion is further supported by the memorandum of law included herewith and incorporated by reference herein.

11. Pursuant to Local Rule 9013-2(c), in the event of an evidentiary hearing on this motion, Great Plains reserves its right to offer oral testimony from a Great Plains representative regarding the facts supporting this motion.

WHEREFORE, Great Plains moves the court for an order that:

- a. Grants Great Plains relief from the automatic stay under 11 U.S.C. § 362(d) to enable Great Plains to exercise its right of setoff;
- b. Waives the 14-day waiting period set forth in Fed. R. Bankr. P. 4001(a)(3); and
- c. Grants such other relief as may be just and equitable.

Respectfully submitted,

Dated: January 13, 2020

/e/ Alexander J. Beeby

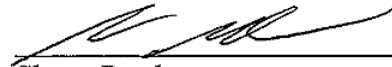
Alexander J. Beeby (398286)
Larkin Hoffman Daly & Lindgren Ltd.
8300 Norman Center Drive
Suite 1000
Minneapolis, Minnesota 55437-1060
(952) 835-3800
abeeby@larkinhoffman.com

Attorneys for Great Plains Beef, LLC

VERIFICATION

I, Shane Peed, owner of Great Plains Beef, LLC, the movant named in the foregoing notice of hearing and motion, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Executed on: 1/9/2020



Shane Peed
100 W Grand Drive
Lincoln, Nebraska 68521

EXHIBIT A

Fill in this information to identify the case:

Debtor 1	Rancher's Legacy Meat Co.
Debtor 2	
(Spouse, if filing)	
United States Bankruptcy Court	District of Minnesota
Case number:	19-32928

FILED
 U.S. Bankruptcy Court
 District of Minnesota
 1/6/2020
 Lori Vosejka, Clerk

**Official Form 410
 Proof of Claim**

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	Great Plains Beef LLC	
	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? Great Plains Beef LLC Name PO Box 82545 Lincoln NE 68501 Contact phone 800-544-1359 Contact email Uniform claim identifier for electronic payments in chapter 13 (if you use one):	Where should payments to the creditor be sent? (if different) Name Contact phone Contact email
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Filed on MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?	

Part 2: Give Information About the Claim as Documented in the Case

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: <u>1236</u>										
7. How much is the claim?	\$ <u>605353.51</u> <div style="float: right; text-align: right;"> Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A). </div>										
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as healthcare information. <u>Goods sold</u>										
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____ Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) <table style="width: 100%;"> <tr> <td style="width: 50%;">Value of property:</td> <td style="width: 50%;">\$ _____</td> </tr> <tr> <td>Amount of the claim that is secured:</td> <td>\$ _____</td> </tr> <tr> <td>Amount of the claim that is unsecured:</td> <td>\$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)</td> </tr> </table> <table style="width: 100%;"> <tr> <td style="width: 60%;">Amount necessary to cure any default as of the date of the petition:</td> <td style="width: 40%;">\$ _____</td> </tr> </table> <table style="width: 100%;"> <tr> <td style="width: 60%;">Annual Interest Rate (when case was filed)</td> <td style="width: 40%;">_____ %</td> </tr> </table> <input type="checkbox"/> Fixed <input type="checkbox"/> Variable	Value of property:	\$ _____	Amount of the claim that is secured:	\$ _____	Amount of the claim that is unsecured:	\$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)	Amount necessary to cure any default as of the date of the petition:	\$ _____	Annual Interest Rate (when case was filed)	_____ %
Value of property:	\$ _____										
Amount of the claim that is secured:	\$ _____										
Amount of the claim that is unsecured:	\$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)										
Amount necessary to cure any default as of the date of the petition:	\$ _____										
Annual Interest Rate (when case was filed)	_____ %										
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____										
11. Is this claim subject to a right of setoff?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Identify the property: <u>Subject to a pre-petition obligation to Debtor of \$9,192.38</u>										

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Check all that apply:	Amount entitled to priority
A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.	<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ _____
	<input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
	<input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
	<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
	<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
	<input checked="" type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(2) that applies	\$ 189544.48
* Amounts are subject to adjustment on 4/1/22 and every 3 years after that for cases begun on or after the date of adjustment.		

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 1/6/2020
MM / DD / YYYY

/s/ Shane Peed

Signature

Print the name of the person who is completing and signing this claim:

Name	Shane Peed		
	First name	Middle name	Last name
Title	Owner		
Company	Great Plains Beef LLC		
Address	Identify the corporate servicer as the company if the authorized agent is a servicer PO Box 82545		
	Number Street Lincoln, NE 68501		
	City State ZIP Code		
Contact phone	800-544-1359	Email	

**PROOF OF CLAIM OF GREAT PLAINS BEEF LLC
ATTACHMENT NO. 1**

**U.S. BANKRUPTCY COURT FOR THE DISTRICT OF MINNESOTA
(ST. PAUL DIVISION)**

**IN RE RANCHER'S LEGACY MEAT CO.
CASE NO. 19-32928**

The \$605,353.51 amount identified on the Proof of Claim is the total claim due to Great Plains Beef, LLC ("Great Plains") based upon goods sold to Debtor as of the bankruptcy filing date (September 20, 2019). Copies of the invoices which form the basis of this claim are collectively attached as Exhibit A and incorporated herein by reference, including redactions of confidential pricing information.

Below is a summary of Great Plains' 20-day administrative claim per Section 503(b)(9) of the United States Bankruptcy Code in the amount \$189,544.48:

<u>Date</u>	<u>Invoice No.</u>	<u>Delivery Date</u>	<u>Amount</u>
9/9/2019	94086	9/4/2019	\$35,281.70
9/9/2019	94088	9/6/2019	\$11,236.82
9/9/2019	94118	9/6/2019	\$16,461.09
9/16/2019	94296	9/13/2019	\$5,300.54
9/16/2019	94298	9/11/2019	\$39,181.32
9/16/2019	94300	9/11/2019	\$8,866.82
9/16/2019	94322	9/13/2019	\$7,020.60
9/23/2019	94492	9/18/2019	\$20,590.44
9/23/2019	94494	9/18/2019	\$9,729.76
9/23/2019	94496	9/18/2019	<u>\$35,875.39</u>
TOTAL			<u>\$189,544.48</u>

DATED this 20th day of December 2019.

GREAT PLAINS BEEF, LLC

By: 

Shane Peed, Owner

GREAT PLAINS BEEF LLC - RANCHER'S LEGACY INVOICES

	<u>Date</u>	<u>Ship Date</u>	<u>Delivery Date</u>	<u>Type</u>	<u>No.</u>	<u>Amount</u>	<u>503(b) Claim</u>
Rancher's Legacy				Credit Carry Forward	C92758	\$ (1,576.89)	
	7/22/2019	7/16/2019	7/19/2019	Invoice	92544	\$ 20,284.76	
	7/22/2019	7/16/2019	7/17/2019	Invoice	92546	\$ 8,036.61	
	7/30/2019	7/23/2019	7/24/2019	Invoice	92758	\$ 29,957.10	
	7/30/2019	7/23/2019	7/24/2019	Invoice	92760	\$ 6,219.63	
	7/30/2019	7/23/2019	7/24/2019	Invoice	92762	\$ 17,029.11	
	8/5/2019	7/30/2019	7/31/2019	Invoice	92964	\$ 37,110.48	
	8/5/2019	7/30/2019	7/31/2019	Invoice	92966	\$ 14,612.45	
	8/5/2019	7/30/2019	7/31/2019	Invoice	92968	\$ 7,599.07	
	8/12/2019	8/6/2019	8/7/2019	Invoice	93194	\$ 45,518.73	
	8/12/2019	8/6/2019	8/7/2019	Invoice	93196	\$ 3,192.29	
	8/12/2019	8/6/2019	8/7/2019	Invoice	93198	\$ 9,441.22	
	8/19/2019	8/13/2019	8/14/2019	Invoice	93430	\$ 5,955.88	
	8/19/2019	8/13/2019	8/14/2019	Invoice	93432	\$ 36,692.44	
	8/19/2019	8/13/2019	8/14/2019	Invoice	93434	\$ 27,462.53	
	8/26/2019	8/20/2019	8/21/2019	Invoice	93640	\$ 335.55	
	8/26/2019	8/20/2019	8/21/2019	Invoice	93642	\$ 3,692.34	
	8/26/2019	8/20/2019	8/21/2019	Invoice	93644	\$ 9,469.85	
	8/26/2019	8/20/2019	8/21/2019	Invoice	93646	\$ 52,594.12	
	8/26/2019	8/22/2019	8/23/2019	Invoice	93668	\$ 24,189.55	
	9/3/2019	8/27/2019	8/28/2019	Invoice	93858	\$ 5,892.20	
	9/3/2019	8/27/2019	8/30/2019	Invoice	93860	\$ 36,550.38	
	9/3/2019	8/27/2019	8/28/2019	Invoice	93862	\$ 14,201.74	
	9/3/2019	8/29/2019	8/30/2019	Invoice	94004	\$ 1,428.89	
	9/9/2019	9/3/2019	9/4/2019	Invoice	94086	\$ 35,281.70	\$ 35,281.70
	9/9/2019	9/5/2019	9/6/2019	Invoice	94088	\$ 11,236.82	\$ 11,236.82
	9/9/2019	9/5/2019	9/6/2019	Invoice	94118	\$ 16,461.09	\$ 16,461.09
	9/16/2019	9/10/2019	9/13/2019	Invoice	94296	\$ 5,300.54	\$ 5,300.54
	9/16/2019	9/10/2019	9/11/2019	Invoice	94298	\$ 39,181.32	\$ 39,181.32
	9/16/2019	9/10/2019	9/11/2019	Invoice	94300	\$ 8,866.82	\$ 8,866.82
	9/16/2019	9/12/2019	9/13/2019	Invoice	94322	\$ 7,020.60	\$ 7,020.60
	9/23/2019	9/17/2019	9/18/2019	Invoice	94492	\$ 20,590.44	\$ 20,590.44
	9/23/2019	9/17/2019	9/18/2019	Invoice	94494	\$ 9,729.76	\$ 9,729.76
	9/23/2019	9/17/2019	9/18/2019	Invoice	94496	\$ 35,875.39	\$ 35,875.39
Rancher's Legacy Total						\$ 605,434.51	\$ 189,544.48



INVOICE

Monday July 22, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 92544

Shipping Date: 07/16/2019

Delivery Date: 07/19/2019

Bill of Lading: 581146

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222 25/75 Trim - Combo	REDACTED			\$1,018.96
10252 50/50 Trim - Combo				\$5,439.23
10282 85/15 Trim - Combo				\$13,826.57
Sub Total:				\$20,284.76
Total:				\$20,284.76
Gross Freight:				Freight Included
Total Amount Due				\$20,284.76

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/09/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.

EXHIBIT A



INVOICE

Monday July 22, 2019

Page 12 of 51

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 92546

Shipping Date: 07/16/2019

Delivery Date: 07/17/2019

Bill of Lading: 581134

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10010	REDACTED			\$959.89
11255				\$1,415.25
11301				\$2,600.42
12011				\$336.46
12013				\$375.11
18511				\$2,349.48
Sub Total:				\$8,036.61
Total:			REDACTED	\$8,036.61
Gross Freight:				Freight Included
Total Amount Due				\$8,036.61

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/07/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Tuesday July 30, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 92758

Shipping Date: 07/23/2019

Delivery Date: 07/24/2019

Bill of Lading: 581565

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Product		Cases	Weight	Price/lb.	Total Amount
10222	25/75 Trim - Combo	REDACTED			\$1,377.12
10252	50/50 Trim - Combo				\$5,226.22
10282	85/15 Trim - Combo				\$23,353.76
Sub Total:					\$29,957.10
Total:		REDACTED			\$29,957.10
Gross Freight:					Freight Included
Total Amount Due					\$29,957.10

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/14/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Tuesday July 30, 2019

PO Box 82545
 Lincoln, NE 68501
 1 (800) 544-1359

Invoice Number: 92760

Shipping Date: 07/23/2019

Delivery Date: 07/24/2019

Bill of Lading: 581570

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
 Customer ID: 5001236
 Rancher's Legacy
 4301 White Bear Parkway
 Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
 Customer ID: 5001236
 Rancher's Legacy
 4301 White Bear Parkway
 Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10010	Center Cut Femur Bones	REDACTED		\$1,037.08
11301	Bnls Chuck Short Ribs			\$3,113.81
11621	Chuck Tender			\$1,354.12
12013	Brisket Points			\$714.62
Sub Total:				\$6,219.63
Total:		REDACTED		\$6,219.63
Gross Freight:				Freight Included
Total Amount Due				\$6,219.63

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/14/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Tuesday July 30, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 92762

Shipping Date: 07/23/2019

Delivery Date: 07/24/2019

Bill of Lading: 581574

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10252	50/50 Trim - Combo	REDACTED		\$4,423.80
10282	85/15 Trim - Combo	REDACTED		\$12,605.31
Sub Total:				\$17,029.11
Total:				\$17,029.11
Gross Freight:				Freight Included
Total Amount Due				\$17,029.11

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/14/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 5, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 92964

Shipping Date: 07/30/2019

Delivery Date: 07/31/2019

Bill of Lading: 582038

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222 25/75 Trim - Combo	REDACTED			\$1,332.48
10252 50/50 Trim - Combo				\$5,741.36
10282 85/15 Trim - Combo				\$30,036.64
Sub Total:				\$37,110.48
Total:		REDACTED		\$37,110.48
Gross Freight:				Freight Included
Total Amount Due				\$37,110.48

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/21/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 5, 2019

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PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 92966

Shipping Date: 07/30/2019

Delivery Date: 07/31/2019

Bill of Lading: 582047

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10252	50/50 Trim - Combo	REDACTED		\$5,911.54
10282	85/15 Trim - Combo			\$8,700.91
Sub Total:				\$14,612.45
Total:		REDACTED		\$14,612.45
Gross Freight:		Freight Included		
Total Amount Due				\$14,612.45

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/21/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 5, 2019

Page 18 of 51

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 92968

Shipping Date: 07/30/2019

Delivery Date: 07/31/2019

Bill of Lading: 582043

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product		Cases	Weight	Price/lb.	Total Amount
10010	Center Cut Femur Bones	REDACTED			\$966.17
11301	Bnls Chuck Short Ribs				\$2,818.28
11621	Chuck Tender				\$1,604.80
18511	Sirloin Flap				\$2,209.82
Sub Total:					\$7,599.07
Total:		REDACTED			\$7,599.07
Gross Freight:					Freight Included
Total Amount Due					\$7,599.07

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/21/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 12, 2019

Page 19 of 51

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93194

Shipping Date: 08/06/2019

Delivery Date: 08/07/2019

Bill of Lading: 582529

Sales Representative: Travis Maxson

Bill To: Rancher's Legacy

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: Rancher's Legacy

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222 25/75 Trim - Combo	REDACTED			\$1,229.76
10252 50/50 Trim - Combo				\$5,744.37
10282 85/15 Trim - Combo				\$38,544.60
Sub Total:				\$45,518.73
Total:		REDACTED		\$45,518.73
Gross Freight:				Freight Included
Total Amount Due				\$45,518.73

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/28/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 12, 2019

Page 20 of 51

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93196

Shipping Date: 08/06/2019

Delivery Date: 08/07/2019

Bill of Lading: 582513

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10252 50/50 Trim - Combo				\$3,192.29
REDACTED				
<i>Sub Total:</i>				\$3,192.29
<i>Total:</i>				\$3,192.29
<i>Gross Freight:</i>				Freight Included
Total Amount Due				\$3,192.29

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/28/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 12, 2019

Page 21 of 51

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93198

Shipping Date: 08/06/2019

Delivery Date: 08/07/2019

Bill of Lading: 582530

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
11211 Lipon Ribeye 0x1	REDACTED			\$3,836.04
11255 Meaty Back Ribs				\$1,160.88
11301 Bnls Chuck Short Ribs				\$3,102.36
11621 Chuck Tender				\$1,341.94
Sub Total:				\$9,441.22
Total:				REDACTED \$9,441.22
Gross Freight:				Freight Included
Total Amount Due				\$9,441.22

Terms: Net 21 days from receipt of goods. Total amount due no later than 08/28/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 19, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 93430

Shipping Date: 08/13/2019

Delivery Date: 08/14/2019

Bill of Lading: 582978

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
11301	Bnls Chuck Short Ribs	REDACTED		\$3,377.78
11621	Chuck Tender			\$1,396.28
12001	Brisket			\$199.68
12013	Brisket Points			\$832.44
Sub Total:				\$5,806.18

Product	Cases	Units	Price/Unit	Total Amount
5282424 Uncured Beef Hot Dog - 4/1	REDACTED			\$149.70
Sub Total:				\$149.70
Total:				\$5,955.88
Gross Freight:				Freight Included

Total Amount Due \$5,955.88

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/04/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 19, 2019

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PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93432

Shipping Date: 08/13/2019

Delivery Date: 08/14/2019

Bill of Lading: 582979

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222 25/75 Trim - Combo	REDACTED			\$716.64
10252 50/50 Trim - Combo	REDACTED			\$3,705.48
10282 85/15 Trim - Combo	REDACTED			\$32,270.32
Sub Total:				\$36,692.44
Total:				\$36,692.44
Gross Freight:				Freight Included
Total Amount Due				\$36,692.44

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/04/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 19, 2019

Page 24 of 51
 PO Box 82545
 Lincoln, NE 68501
 1 (800) 544-1359

Invoice Number: 93434

Shipping Date: 08/13/2019

Delivery Date: 08/14/2019

Bill of Lading: 583008

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
 Customer ID: 5001236
 Rancher's Legacy
 4301 White Bear Parkway
 Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
 Customer ID: 5001236
 Rancher's Legacy
 4301 White Bear Parkway
 Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222	25/75 Trim - Combo	REDACTED		\$807.84
10252	50/50 Trim - Combo			\$5,809.34
10282	85/15 Trim - Combo			\$4,551.35
10282	85/15 Trim - Combo			\$16,294.00
Sub Total:				\$27,462.53
Total:			REDACTED	\$27,462.53
Gross Freight:				Freight Included
Total Amount Due				\$27,462.53

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/04/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday August 26, 2019

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PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93640

Shipping Date: 08/20/2019

Delivery Date: 08/21/2019

Bill of Lading: 583498

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
18541 Tri-Tip PLD	REDACTED			\$335.55
Sub Total:				\$335.55
Total:				\$335.55
Gross Freight:				Freight Included
Total Amount Due				\$335.55

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/11/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Monday August 26, 2019

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PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93642

Shipping Date: 08/20/2019

Delivery Date: 08/21/2019

Bill of Lading: 583522

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10252 50/50 Trim - Combo	REDACTED			\$3,692.34
Sub Total:				\$3,692.34
Total:				\$3,692.34
Gross Freight:				Freight Included
Total Amount Due				\$3,692.34

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/11/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Monday August 26, 2019

Page 27 of 51

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93644

Shipping Date: 08/20/2019

Delivery Date: 08/21/2019

Bill of Lading: 583478

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
11211 Lipon Ribeye 0x1	REDACTED			\$1,809.88
11255 Meaty Back Ribs				\$1,726.74
11301 Bnls Chuck Short Ribs				\$3,171.85
11621 Chuck Tender				\$1,505.75
12013 Brisket Points				\$1,255.63
Sub Total:				\$9,469.85
Total:				\$9,469.85
Gross Freight:				Freight Included
Total Amount Due				\$9,469.85

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/11/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Monday August 26, 2019

Page 28 of 51
 PO Box 82545
 Lincoln, NE 68501
 1 (800) 544-1359

Invoice Number: 93646

Shipping Date: 08/20/2019

Delivery Date: 08/21/2019

Bill of Lading: 583479

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
 Customer ID: 5001236
 Rancher's Legacy
 4301 White Bear Parkway
 Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
 Customer ID: 5001236
 Rancher's Legacy
 4301 White Bear Parkway
 Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount		
10222 25/75 Trim - Combo	REDACTED			\$2,127.69		
10252 50/50 Trim - Combo				\$7,193.42		
10282 85/15 Trim - Combo				\$43,273.01		
Sub Total:						
\$52,594.12						
Total:						
\$52,594.12						
Gross Freight:				Freight Included		
Total Amount Due				\$52,594.12		

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/11/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Monday August 26, 2019

Page 29 of 51
 PO Box 82545
 Lincoln, NE 68501
 1 (800) 544-1359

Invoice Number: 93668

Shipping Date: 08/22/2019

Delivery Date: 08/23/2019

Bill of Lading: 583578

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222	25/75 Trim - Combo	REDACTED		\$788.19
10252	50/50 Trim - Combo			\$1,359.99
10282	85/15 Trim - Combo			\$8,124.00
10282	85/15 Trim - Combo			\$13,917.37
Sub Total:				\$24,189.55
Total:			REDACTED	\$24,189.55
Gross Freight:				Freight Included
Total Amount Due				\$24,189.55

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/13/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Tuesday September 3, 2019

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93858

Shipping Date: 08/27/2019

Delivery Date: 08/28/2019

Bill of Lading: 583968

Sales Representative: Travis Maxson

Bill To: Rancher's Legacy

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: Rancher's Legacy

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10010	Center Cut Femur Bones	REDACTED		\$795.69
11255	Meaty Back Ribs			\$1,088.26
11301	Bnls Chuck Short Ribs			\$2,506.63
11621	Chuck Tender			\$1,501.62
Sub Total:			\$5,892.20	
Total:		REDACTED		\$5,892.20
Gross Freight:				Freight Included
Total Amount Due				\$5,892.20

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/18/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Tuesday September 3, 2019

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 93860

Shipping Date: 08/27/2019

Delivery Date: 08/30/2019

Bill of Lading: 583967

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222 25/75 Trim - Combo	REDACTED			\$1,227.36
10252 50/50 Trim - Combo				\$5,211.47
10282 85/15 Trim - Combo				\$30,111.55
Sub Total:				\$36,550.38
Total:		REDACTED		\$36,550.38
Gross Freight:				Freight Included
Total Amount Due				\$36,550.38

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/20/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Tuesday September 3, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 93862

Shipping Date: 08/27/2019

Delivery Date: 08/28/2019

Bill of Lading: 583984

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10252	50/50 Trim - Combo	REDACTED		\$4,912.90
10282	85/15 Trim - Combo	REDACTED		\$9,288.84
Sub Total:				\$14,201.74
Total:				REDACTED \$14,201.74
Gross Freight:				Freight Included
Total Amount Due				\$14,201.74

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/18/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Tuesday September 3, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94004

Shipping Date: 08/29/2019

Delivery Date: 08/30/2019

Bill of Lading: 135300

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
11211 Lipon Ribeye 0x1	REDACTED			\$1,428.89
Sub Total:				\$1,428.89
Total:				\$1,428.89
Gross Freight:				Freight Included
Total Amount Due				\$1,428.89

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/20/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday September 9, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94086

Shipping Date: 09/03/2019

Delivery Date: 09/04/2019

Bill of Lading: 584441

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222	25/75 Trim - Combo	REDACTED		\$1,153.44
10252	50/50 Trim - Combo			\$5,687.43
10282	85/15 Trim - Combo			\$28,440.83
Sub Total:			\$35,281.70	
Total:		REDACTED		\$35,281.70
Gross Freight:				Freight Included
Total Amount Due				\$35,281.70

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/25/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday September 9, 2019

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 94088

Shipping Date: 09/05/2019

Delivery Date: 09/06/2019

Bill of Lading: 584628

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10010 Center Cut Femur Bones	REDACTED			\$893.41
11211 Lipon Ribeye 0x1				\$3,547.05
11255 Meaty Back Ribs				\$1,253.06
11301 Bnls Chuck Short Ribs				\$2,906.92
11621 Chuck Tender				\$1,216.24
12013 Brisket Points				\$1,420.14
<i>Sub Total:</i>				\$11,236.82

Total:

REDACTED

\$11,236.82

Gross Freight:

Freight Included

Total Amount Due

\$11,236.82

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/27/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday September 9, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94118

Shipping Date: 09/05/2019

Delivery Date: 09/06/2019

Bill of Lading: 584624

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10252 50/50 Trim - Combo	REDACTED			\$7,206.30
10282 85/15 Trim - Combo				\$9,254.79
<i>Sub Total:</i>				\$16,461.09
<i>Total:</i>	REDACTED			\$16,461.09
<i>Gross Freight:</i>				Freight Included
Total Amount Due				\$16,461.09

Terms: Net 21 days from receipt of goods. Total amount due no later than 09/27/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday September 16, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94296

Shipping Date: 09/10/2019

Delivery Date: 09/13/2019

Bill of Lading: 584957

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10010	Center Cut Femur Bones	REDACTED		\$617.28
11211	Lipon Ribeye 0x1		\$2,543.96	
11255	Meaty Back Ribs		\$1,330.79	
11621	Chuck Tender		\$808.51	
Sub Total:				\$5,300.54
Total:			REDACTED	\$5,300.54
Gross Freight:				Freight Included
Total Amount Due				\$5,300.54

Terms: Net 21 days from receipt of goods. Total amount due no later than 10/04/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday September 16, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94298

Shipping Date: 09/10/2019

Delivery Date: 09/11/2019

Bill of Lading: 584958

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222	25/75 Trim - Combo	REDACTED		\$1,619.52
10252	50/50 Trim - Combo			\$5,196.14
10282	85/15 Trim - Combo			\$32,365.66
Sub Total:			\$39,181.32	
Total:		REDACTED		\$39,181.32
Gross Freight:				Freight Included
Total Amount Due				\$39,181.32

Terms: Net 21 days from receipt of goods. Total amount due no later than 10/02/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday September 16, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94300

Shipping Date: 09/10/2019

Delivery Date: 09/11/2019

Bill of Lading: 584960

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10252	50/50 Trim - Combo	REDACTED		\$4,220.13
10282	85/15 Trim - Combo	REDACTED		\$4,646.69
Sub Total:				\$8,866.82
Total:				\$8,866.82
Gross Freight:				Freight Included
Total Amount Due				\$8,866.82

Terms: Net 21 days from receipt of goods. Total amount due no later than 10/02/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Monday September 16, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94322

Shipping Date: 09/12/2019

Delivery Date: 09/13/2019

Bill of Lading: 585095

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222	25/75 Trim - Combo	REDACTED		\$1,132.32
10252	50/50 Trim - Combo			\$624.15
10282	85/15 Trim - Combo			\$5,264.13
Sub Total:			\$7,020.60	
Total:		REDACTED		\$7,020.60
Gross Freight:				Freight Included
Total Amount Due				\$7,020.60

Terms: Net 21 days from receipt of goods. Total amount due no later than 10/04/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Monday September 23, 2019

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 94492

Shipping Date: 09/17/2019

Delivery Date: 09/18/2019

Bill of Lading: 135828

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222	REDACTED			\$1,353.60
10252				\$3,580.65
10282				\$15,656.19
Sub Total:				\$20,590.44
Total:		REDACTED	\$20,590.44	
Gross Freight:			Freight Included	
Total Amount Due				\$20,590.44

Terms: Net 21 days from receipt of goods. Total amount due no later than 10/09/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

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INVOICE

Monday September 23, 2019

PO Box 82545

Lincoln, NE 68501

1 (800) 544-1359

Invoice Number: 94494

Shipping Date: 09/17/2019

Delivery Date: 09/18/2019

Bill of Lading: 585423

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**

Customer ID: 5001236

Rancher's Legacy

4301 White Bear Parkway

Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
11211 Lipon Ribeye 0x1	REDACTED			\$2,653.70
11255 Meaty Back Ribs				\$1,268.66
11301 Bnls Chuck Short Ribs				\$2,966.52
11621 Chuck Tender				\$1,483.54
12013 Brisket Points				\$1,357.34
Sub Total:				\$9,729.76
Total:			REDACTED	\$9,729.76
Gross Freight:				Freight Included
Total Amount Due				\$9,729.76

Terms: Net 21 days from receipt of goods. Total amount due no later than 10/09/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.



INVOICE

Monday September 23, 2019

PO Box 82545
Lincoln, NE 68501
1 (800) 544-1359

Invoice Number: 94496

Shipping Date: 09/17/2019

Delivery Date: 09/18/2019

Bill of Lading: 585424

Sales Representative: Travis Maxson

Bill To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Ship To: **Rancher's Legacy**
Customer ID: 5001236
Rancher's Legacy
4301 White Bear Parkway
Vadnais Heights, MN 55110

Product	Cases	Weight	Price/lb.	Total Amount
10222	25/75 Trim - Combo	REDACTED		\$1,272.48
10252	50/50 Trim - Combo			\$6,302.82
10282	85/15 Trim - Combo			\$28,300.09
Sub Total:			\$35,875.39	
Total:		REDACTED		\$35,875.39
Gross Freight:				Freight Included
Total Amount Due				\$35,875.39

Terms: Net 21 days from receipt of goods. Total amount due no later than 10/09/2019.

Discrepancy in quantity, weights and condition must be reported immediately to your representative on receipt of goods. Please provide details and photos to verify concerns. Thank you.

Born, raised, and harvested in the United States.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:	Bankr. Case No. 19-32928 (MER)
Rancher's Legacy Meat Co.,	Chapter 11
Debtor.	

**MEMORANDUM OF LAW IN SUPPORT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY**

Great Plains Beef, LLC ("Great Plains"), an unsecured creditor in the above-referenced bankruptcy, by and through undersigned counsel, hereby moves the Court for relief from the automatic stay pursuant to 11 U.S.C. §§ 362(d) and 553, Fed. R. Bankr. P. 4001, and Local Rule 4001-1, in order for Great Plains to exercise its right of setoff. In support of this Motion, Great Plains states:

Debtor's Bankruptcy

1. Rancher's Legacy Meat Co. ("Debtor") filed a Voluntary Petition for Relief under Chapter 11 of the Bankruptcy Code on September 20, 2019 (the "Petition Date"). (Doc. 1)
2. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(G). Venue of this case is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

3. Great Plains is an exclusive provider of Certified Piedmontese Beef based in Lincoln, Nebraska.
4. Debtor is a meat processing business, providing meat products to customers in the upper Midwest area of the United States.

5. Pre-petition, Great Plains sold goods to Debtor. As of the Petition Date, Debtor owed Great Plains \$605,353.51 based on approximately 33 unpaid invoices that existed as of that date (collectively, the “Great Plains Indebtedness”). (Proof of Claim No. 16, Ex. A.)

6. Based on the unpaid invoices, Great Plains has a 20-day administrative claim under 11 U.S.C. § 503(b)(9) in the amount of \$189,544.48. *See id.*

7. In addition, pre-petition, Debtor issued invoices to Great Plains that remained unpaid as of the Petition Date. These invoices are summarized as follows (collectively, the “Debtor Invoices”):

Invoice Date	Invoice No.	Amount
9/9/2019	144018	\$594.75
9/9/2019	144028	\$3,376.00
9/16/2019	144067	\$1,170.50
9/16/2019	144068	\$4,051.13
Total		\$9,192.38

8. According to the terms set forth on the Debtor Invoices, payment on the Debtor invoices was due seven (7) days after the ship date on each invoice, meaning payment on each invoice was due prior to the commencement of this case.

Relief from Automatic Stay

9. Great Plains is requesting that the Court grant it relief from the automatic stay under 11 U.S.C. § 362(d) to apply the amount of the Debtor Invoices to the Great Plains Indebtedness, thus exercising its right of setoff as authorized by 11 U.S.C. § 553. *See* 11 U.S.C. § 362(a)(7) (stating that a creditor must obtain relief from the automatic stay in order to setoff any debt owing to the debtor that arose before commencement of the case).

10. “Section 553 of the Code ‘preserves the rights of creditors to offset mutual debts arising before a bankruptcy petition is filed.’” *Ries v. Legendary Marine, Inc. (In re Genmar Holdings, Inc.)*, 481 B.R. 500, 501 (D. Minn. Bankr. 2012) (quoting *Superpumper v. Nerland Oil (In Re Nerland Oil)*, 303 F.3d 911, 917 (8th Cir. 2002)).

11. The Bankruptcy Code requires that, in order for a creditor to exercise a right of setoff, the following elements are met: (a) the creditor – here, Great Plains – owes a debt to the Debtor arising pre-petition; (b) Great Plains has a claim against the Debtor arising pre-petition; and (c) both the debt and the claim are mutual obligations. *See id.* (internal quotations omitted). “In other words, it is necessary only that the debt and the claim both arose prepetition and are mutual.” *United States v. Gerth*, 991 F.2d 1428, 1431 (8th Cir. 1993) (citations omitted).

12. Here, pre-petition, Great Plains owed Debtor \$9,192.38 and Great Plains has a claim against the Debtor arising pre-petition in an amount in excess of \$600,000. The debt and claims both arose prepetition and are mutual, insofar as Great Plains both owed Debtor pre-petition and is asserting setoff. *See Gerth*, 991 F.2d at 1436.

13. Section 553(a) of the Bankruptcy Code makes a creditor’s right of setoff subject to the automatic stay of § 362. *In Re Olson*, 175 B.R. 30, 32 (D. Neb. Bankr. 1994) (citing 11 U.S.C. §§ 553(a) & 362(a)(7)).

14. Section 362(d) of the Code states that the Court “shall” grant relief from stay (a) “for cause,” which includes but is not limited to Great Plains’ lack of adequate protection, or (b) with respect to property that the Debtor has no equity in and is not necessary to an effective reorganization. *See* 11 U.S.C. § 362(d).

15. By establishing a right of setoff, Great Plains has made a *prima facie* showing of “cause” for relief under § 362(d)(1), and the burden shifts to Debtor to show that it will provide adequate protection. *See Olson*, 175 B.R. at 32.

16. Debtor will be unable to show that it will provide adequate protection to Great Plains so as to prevent Great Plains from exercising its right of setoff. As of the Petition Date, Debtor owed Great Plains, an unsecured creditor, in excess of \$600,000. Great Plains simply seeks to provide itself some small level of protection by setting off the approximately \$9,000 it owes to Debtor against that much larger sum.

17. Great Plains requests therefore that it be granted permission to exercise its right of setoff, setting off the amount of the Debtor invoices it owes to Debtor against the Great Plains Indebtedness, which is in excess of \$600,000.

Conclusion

18. Based on the foregoing, Great Plains respectfully requests that the Court enter an Order that (a) grants Great Plains relief from the automatic stay under 11 U.S.C. § 362(d) to enable Great Plains to exercise its right of setoff, (b) waives the 14-day waiting period set forth in Fed. R. Bankr. P. 4001(a)(3), and (c) grants such further relief as is just and equitable.

Dated: January 13, 2020

/s/ Alexander J. Beeby

Alexander J. Beeby (398286)
Larkin Hoffman Daly & Lindgren Ltd.
8300 Norman Center Drive
Suite 1000
Minneapolis, Minnesota 55437-1060
(952) 835-3800
abeeby@larkinhoffman.com

Attorneys for Great Plains Beef, LLC

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re: Bankr. Case No. 19-32928 (MER)
Rancher's Legacy Meat Co., Chapter 11
Debtor.

ORDER GRANTING GREAT PLAINS BEEF, LLC'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY

This case is before the court on the motion of Great Plains Beef, LLC for relief from the automatic stay imposed by 11 U.S.C. § 362(a). Based on the motion and the record, the court finds that grounds exist under 11 U.S.C. § 362(d) to warrant relief.

IT IS ORDERED:

1. The motion is **GRANTED**.
2. The automatic stay is lifted so that Great Plains Beef, LLC, may exercise its right of setoff under 11 U.S.C. § 362(d).
3. Notwithstanding Fed. R. Bankr. P. 4001(a)(3), this order is effective immediately.

Dated:

Michael E. Ridgway
Chief United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Case No. 19-32928

Rancher's Legacy Meat Co.,

Chapter 11

Debtor.

AFFIDAVIT OF SERVICE

Under penalty of perjury, I declare that on January 13, 2020, I served the following documents:

1. Notice of Appearance and Request for Notice and Service,
2. Notice of Motion and Motion for Relief from Automatic Stay with attached Exhibit A,
3. Memorandum of Law in Support of Motion for Relief from Automatic Stay,
4. Proposed Order Granting Great Plains Beef, LLC's Motion for Relief from the Automatic Stay, and
5. Affidavit of Service

upon the attached service list via ECF or U.S. Mail, postage prepaid, addressed as listed.

Dated: January 13, 2020

/e/ Gina M. Rice

Gina M. Rice

9013-3(a)(2) Service List
In re Rancher's Legacy Meat Co.
MN Ch. 11 Bankr. Case No. 19-32928

DEBTOR

Rancher's Legacy Meat Co.
FKA Unger Meat Company
4301 White Bear Parkway
Vadnais Heights, MN 55110
(Via U.S. Mail)

**INTERNAL REVENUE
SERVICE**

Internal Revenue Service
Centralized Insolvency
Operations
P.O. Box 7346
Philadelphia, PA 19101-7346
(Via U.S. Mail)

Foley & Mansfield, PLLP
250 Marquette Avenue
Suite 1200
Minneapolis, MN 55401
(Via U.S. Mail)

DEBTOR'S ATTORNEY

Thomas and Cameron A. Lallier
Foley & Mansfield, PLLP
250 Marquette Avenue
Suite 1200
Minneapolis, MN 55401
(Via ECF)

**COLLECTION DIVISION OF
MN DEPT. OF REVENUE**

Minnesota Department of
Revenue
Bankruptcy Section
P.O. Box 64447
Saint Paul, MN 55164-0447
(Via U.S. Mail)

Great Plains Beef LLC
P.O. Box 82545
Lincoln, NE 68501
(Via U.S. Mail)

SECURED CREDITORS

James A. Ratcliff
Ratcliff Ranch
24631 South Highway 2
Vinita, OK 74301
(Via U.S. Mail)

**UNITED STATES ATTORNEY
FOR DISTRICT OF MN**

United States Attorney
600 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415-3070
(Via U.S. Mail)

J&B Partners
13200 – 43rd Street Northeast
Saint Michael, MN 55376
(Via U.S. Mail)

Professional Driven Solutions
OBO James A. Ratcliff
Attn: Debi S. Hood, CEO
120 South Wilson
Suite A
Vinita, OK 74301
(Via U.S. Mail)

**GOVERNMENTAL
CREDITORS**

City of Vadnais Heights
800 East County Road E
Vadnais Heights, MN 55127
(Via U.S. Mail)

Kloster Collateral Resources
606 – 25th Avenue South #104
Saint Cloud, MN 56301
(Via U.S. Mail)

Nissan Motor Acc. Corp.
P.O. Box 660360
Dallas, TX 75266-0360
(Via U.S. Mail)

White Bear Township
1281 Hammond Road
White Bear Township, MN
55110
(Via U.S. Mail)

John A. Morris
Pachulski Stang Ziehl & Jones
LLP
780 Third Avenue, 34th Floor
New York, NY 10017
(Via U.S. Mail)

Ocschner Partnership
Attn: Todd Ocschner
13350 – 379th Avenue
Aberdeen, SD 57401
(Via U.S. Mail)

MANUAL NOTICE LIST

Ben E. Keith Company
7650 Will Rogers Boulevard
Fort Worth, TX 76140
(Via U.S. Mail)

Pachulski Stang Ziehl & Jones
919 North Market Street
17th Floor
Wilmington, DE 19801
(Via U.S. Mail)

Upper Lakes Foods
801 Industry Avenue
Cloquet, MN 55720
(Via U.S. Mail)

Michael E. Brown
Kutak Rock LLP
2300 Main Street
Suite 800
Kansas City, MO 64108
(Via U.S. Mail)

Platinum Management LLC
12301 Whitewater Drive
Suite 10
Minnetonka, MN 55343
(Via U.S. Mail)

UNITED STATES TRUSTEE
1015 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415-3070
(Via ECF)

John T. Coghlan
Kutak Rock LLP
2300 Main Street
Suite 800
Kansas City, MO 64108
(Via U.S. Mail)

Barton L. Seebach
Story Schoeberl & Seebach LLP
126 North Elm Street
P.O. Box 89
Cresco, IA 52136
(Via U.S. Mail)

COMMITTEES
Official Committee of
Unsecured Creditors
C/o Bassford Remele, P.A.
100 South Fifth Street
Suite 1500
Minneapolis, MN 55402-1254
(Via U.S. Mail)

Empirical Foods Inc.
950 Willow Drive
Dakota Dunes, SD 57049
(Via U.S. Mail)

Upper Iowa Beef LLC
4164 Highway 63
Circle Springs, IA 52155
(Via U.S. Mail)

4820-8572-0497, v. 1